



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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August 15, 2000

Mr. Steven H. Wisness, Director  
Office of Site Services  
U.S. Department of Energy  
P.O. Box 550, MSIN: A2-15  
Richland, Washington 99352

Mr. Ronald D. Hanson, President  
Fluor Hanford  
P.O. Box 1000, MSIN: H5-20  
Richland, Washington 99352

Dear Messrs. Wisness and Hanson:

Re: Hanford Dangerous Waste Part A Permit Application, Form 3, Revision 2, for the  
Plutonium Finishing Plant (PFP) Treatment and Storage Unit, dated July 6, 2000

The Washington State Department of Ecology (Ecology) has reviewed the U.S. Department of Energy's (USDOE) current application for the PFP Treatment Unit Part A, Form 3, Revision 2, dated July 6, 2000. Ecology supports stabilizing PFP's mixed waste and transitioning the PFP to slab-on-grade status; however, Ecology can not approve the Part A application as submitted for the reasons stated below.

The USDOE currently has a Part A, Form 3, to treat mixed waste in the PFP treatment unit. This Part A was originally submitted in December 1998 and revised in April 2000. Ecology has acknowledged and accepted the Part A's.<sup>1</sup>

However, the latest Part A, Form 3 (Revision 2), submitted on July 6, 2000, expands the scope of the current Part A (Revision 1) to include storage of mixed waste from the cementation process and other packaging activities. There are several problems associated with this proposal, most notably:

- **Non-compliant storage of mixed waste has been a long-standing problem at PFP. The proposal to permit a storage area for "other repackaging activities" is inappropriate. The non-compliant mixed waste storage situation at PFP will need to be resolved through compliance measures and schedules leading to transition of the facility or inclusion in the Sitewide Permit as an operating unit or unit undergoing closure.**

Since the intent of treating PFP mixed wastes (e.g., sand, slag, and crucible) in the cementation process is to remove the characteristics of ignitability and reactivity and thus meet the Waste Isolation Pilot Plant

<sup>1</sup> Ecology is currently evaluating the applicability of interim status at the Hanford Site following issuance of the Sitewide Permit in 1994. Ecology is working on a policy on this subject which will be completed this fall/winter. At that time, PFP and other units on Hanford will be evaluated to see if interim status standards are being appropriately applied.

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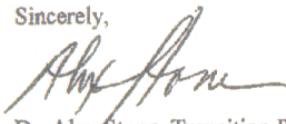
(WIPP) waste acceptance criteria, USDOE should also evaluate whether the proposed treatment will also remove any other wastes codes which may be applicable to these wastes. If the treatment removes all characteristics, and listed codes do not apply, the treated waste will no longer be subject to Resource Conservation and Recovery Act (RCRA) Subtitle C jurisdiction other than possible land disposal restrictions (LDR) treatment requirements<sup>2</sup>.

Ecology has received, and is in the process of reviewing, the documents USDOE recently submitted in support of interim status standards for the PFP treatment unit. As you know, on January 28, 2000, Ecology formally requested that, no later than October 31, 2000, USDOE submit a Final Facility Permit Application for the PFP treatment unit. To USDOE's credit, it appears that much of the information required for this submittal has been developed.

In addition, Ecology understands and supports USDOE's desire to begin the Pipe-and-Go repackaging of Hanford and Rocky Flats ash, but such activities must be conducted in full compliance with applicable rules and regulations. As noted above, in order to proceed with this repackaging effort, USDOE and Ecology will need to develop compliance measures and schedules to address the current non-compliant storage situation of PFP's ash, the planned repackaging activities, and future storage, treatment, and/or disposal plans for this waste stream. These discussions can occur in the near-term. Similar discussions are needed to develop compliance measures and schedules to address the storage, treatment, and/or disposal of the other mixed wastes at PFP. These discussions can occur after Ecology completes the PFP assessment that is currently in progress. Failure of USDOE to enter into good-faith discussions to resolve PFP waste storage, treatment, and disposal issues may subject USDOE to formal enforcement action.

If you have any questions about this letter, please contact me at (509) 736-3018. I look forward to hearing from you so we can schedule the development of compliance measures and schedules as necessary to support the compliant storage, treatment, and disposal of PFP's mixed wastes.

Sincerely,



Dr. Alex Stone, Transition Project Manager  
 Nuclear Waste Program

AS:LR:sb

cc: Dave Bartus, EPA  
 Astrid Larsen, USDOE  
 Larry Romine, USDOE  
 Roger Bowman, FH  
 George Jackson, FH  
 Mary Lou Blazek, OOE  
 Administrative Record: PFP

<sup>2</sup> While wastes destined to WIPP are not required to meet LDR treatment requirements due to the approved RCRA no migration at WIPP, these wastes remain subject to LDR requirements while stored on site, and must be accounted for in the annual LDR report prepared under TPA milestone M-26.